TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

September 28, 1995

SENT VIA FACSIMILE & CERTIFIED MAIL

Ms. Lisa Marie Price
Remedial Project Manager
Crystal Chemical Superfund Site
U.S. Environmental Protection Agency
Region 6, 6H-SC
Allied Bank Tower
1445 Ross Avenue
Dallas, TX 75202-2733

RE: "Assessment of the Technical Impracticability of Ground-Water Remediation",
Crystal Chemical Site, Houston, Texas

Dear Lisa:

This letter serves to communicate Texas Natural Resource Conservation Commission (TNRCC) comments with regard to Southern Pacific Transportation Company's (SPTCo) ground-water technical impracticability (TI) waiver for a portion of the remedy as presented in the referenced document.

The information provided by SPTCo in the referenced document and in the supporting documentation appears to support the TI waiver. Specifically, the presentation of the TI waiver information in SPTCo's TI assessment document has addressed the issues presented in the April 20, 1995 letter from the TNRCC. The main issues to be addressed in the TI waiver request that were presented in that letter were:

1) potential source control measures;

2) remedial action performance analysis (i.e., groundwater monitoring programs); and,

3) the presentation of other viable remedial alternatives for ground-water restoration.

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The TNRCC believes that SPTCo has presented the supporting data and appropriate documentation for a ground-water TI waiver at the Crystal Chemical Site. The remedial alternative proposed by SPTCo for ground-water that incorporates the installation of a slurry wall for physical containment of the majority of arsenic-contaminated ground-water in the 15-foot and 35-foot zones, coupled with an extraction well for long-term pumping and treating of the arsenic-contaminated ground-water located in the channel sands, seems to be the logical approach for addressing the ground-water remediation at Crystal Chemical. The TNRCC acknowledges that the proposed ground-water remedial strategy may be even more effective than otherwise at mitigating off-site arsenic-contaminated ground-water migration considering the fact that the arsenic-bearing soils which acted as potential source materials have been excavated and removed from Pond Numbers 1 and 2.

Please contact me with any questions concerning these comments or any other issues at the Crystal Chemical site at (512) 239-2030.

Sincerely,

E. R. (Trey) Collins, III
Project Manager
Superfund Engineering Section
Pollution Cleanup Division

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